

EXHIBIT A

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

- - -

IN RE: TERRORIST ATTACKS : 03-MDL-1570
ON SEPTEMBER 11, 2001 : (GBD)(SN)

- - -

APRIL 27, 2021
THIS TRANSCRIPT CONTAINS
CONFIDENTIAL MATERIAL

- - -

Remote Videotaped
Deposition, taken via Zoom, of JOHN
SIDEL, commencing at 7:02a.m., on the
above date, before Amanda
Maslynsky-Miller, Certified Realtime
Reporter and Notary Public in and for the
Commonwealth of Pennsylvania.

- - -

GOLKOW LITIGATION SERVICES
877.370.3377 ph| 917.591.5672 fax
deps@golkow.com

1 APPEARANCES:

2

3

KREINDLER & KREINDLER LLP
BY: ANDREW J. MALONEY III, ESQUIRE
750 Third Avenue
New York, New York 10017
(212) 687-8181
amaloney@kreindler.com
Representing the Ashton, et al.,
Plaintiffs

7

8

9

COZEN O'CONNOR P.C.
BY: SEAN P. CARTER, ESQUIRE
BY: J. SCOTT TARBUTTON, ESQUIRE
One Liberty Place
1650 Market Street
Suite 2800
Philadelphia, Pennsylvania 19103
(215) 665-2000
scarter1@cozen.com
starbutton@cozen.com
Representing the Plaintiffs

15

16

17

ANDERSON KILL P.C.
BY: BRUCE STRONG, ESQUIRE
1251 Avenue of the Americas
New York, New York 10020
(212) 278-1000
bstrong@andersonkill.com
Representing the Plaintiffs'
Steering Committee

21

22

23

24

1 APPEARANCES: (Continued)

2

3

4

MOTLEY RICE LLC

BY: ROBERT T. HAEFELE, ESQUIRE

5

BY: JADE A. HAILESELASSIE, ESQUIRE

BY: JODI WESTBROOK FLOWERS, ESQUIRE

6

28 Bridgeside Boulevard

Mount Pleasant, South Carolina 29464

7

(843) 216-9000

rhaefele@motleyrice.com

8

jhaileselassie@motleyrice.com

jflowers@motleyrice.com

9

Representing the Plaintiffs' Steering
Committee and the Burnett Plaintiffs

10

11

12

13

JONES DAY

BY: ERIC SNYDER, ESQUIRE

14

BY: STEVEN COTTREAU, ESQUIRE

BY: ABIGAELE BOSCH, ESQUIRE

15

51 Louisiana Avenue, N.W.

Washington, D.C. 20001

16

(202) 879-3939

esnyder@jonesday.com

17

scottreau@jonesday.com

abosch@jonesday.com

18

Representing the Defendant,
Dubai Islamic Bank

19

20

21

22

23

24

1 APPEARANCES: (Continued)

2

3

LEWIS BAACH KAUFMANN MIDDLEMISS PLLC

BY: WALEED NASSAR, ESQUIRE

4

BY: AISHA E.R. BEMBRY, ESQUIRE

BY: SUMAYYA KHATIB, ESQUIRE

5

1101 New York Avenue, N.W.

Suite 1000

6

Washington, DC 20005

(202) 833-8900

7

waleed.nassar@lbkmlaw.com

aisha.bembry@lbkmlaw.com

8

sumayya.khatib@lbkmlaw.com

Representing the Defendants,

9

Muslim World League, the

International Islamic Relief

10

Organization, and

Drs. Turki, Al-Obaid, Naseef and Basha

11

12

LAW FIRM OF OMAR T. MOHAMMEDI, LLC

13

BY: JOSHUA MORRISON, ESQUIRE

BY: STEVE SEIGLER, ESQUIRE

14

233 Broadway

Suite 820

15

New York, New York 10279

(212) 725-3846

16

jmorrisson@otmlaw.com

sseigler@otmlaw.com

17

Representing the Defendant,

WAMY and WAMY International

18

19 ALSO PRESENT:

20 David Lane, Videographer

Zac Hone, Trial Technician

21

Raymond Rivera, IT, Cozen O'Connor

22

Nour Subani, Paralegal, Lewis Baach Kaufman

23

Middlemiss PLLC

24

1	- - -	
2	I N D E X	
3	- - -	
4		
5	Testimony of: JOHN SIDEL	
6	By Mr. Carter	9
7		
8	- - -	
9	E X H I B I T S	
10	- - -	
11	NO. DESCRIPTION PAGE	
12	Sidel-597 No Bates	
13	Notice of Oral Deposition	
14	of John Sidel 12	
15	Sidel-598 No Bates	
16	Expert Report of Professor	
17	John Sidel 15	
18	Sidel-599 No Bates	
19	Parliament Motion, Saudi	
20	Arabia and The School of	
21	Oriental and African	
22	Studies 36	
23	Sidel-600 No Bates	
24	Excerpts, 9/11 Commission	
	Report 53	
	Sidel-601 FED-PEC0237854-7873	
	RAND Corporation Testimony 64	
	Sidel-602 FED-PEC0202113-2132	
	Department of the Treasury	
	Memorandum 84	

This transcript contains confidential material

1		-	-	-					
2		E	X	H	I	B	I	T	S
3		-	-	-					
4									
	NO.		DESCRIPTION						PAGE
5									
	Sidel-603		FED-PEC0173851-3854						
6			State Department Diplomatic						
			Cable						85
7									
	Sidel-604		No Bates						
8			Seeds of Terror,						
			Maria Ressa						92
9									
	Sidel-605		No Bates						
10			Excerpts, 9/11 Commission						
			Report						109
11									
	Sidel-606		No Bates						
12			Michael Scheuer, Osama bin						
			Laden, Excerpts						111
13									
	Sidel-607		No Bates						
14			9/11 Commission Report						156
15	Sidel-608		No Bates						
			Sidel Invoices						187
16									
17									
18									
19									
20									
21									
22									
23									
24									

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24

- - -
- - -

DEPOSITION SUPPORT INDEX

Direction to Witness Not to Answer

Page Line	Page Line	Page Line
-----------	-----------	-----------

None

Request for Production of Documents

Page Line	Page Line	Page Line
-----------	-----------	-----------

None

Stipulations

Page Line	Page Line	Page Line
-----------	-----------	-----------

8	1	
---	---	--

Question Marked

Page Line	Page Line	Page Line
-----------	-----------	-----------

None

1 much in the press and in certain
2 kinds of more specialized
3 reportage on Southeast Asia and on
4 these organizations. It was
5 there.

6 So in terms of al-Qaeda,
7 yes.

8 BY MR. CARTER:

9 Q. And did you conduct any
10 independent research, prior to serving as
11 an expert in this case, concerning those
12 allegations?

13 A. No. No, I'm not sure how I
14 would have done so.

15 Q. Professor Sidel, as I
16 understand the description of your
17 qualifications, you are an expert on
18 Southeast Asia and political conditions
19 and violence in the Philippines and
20 Indonesia; is that correct?

21 A. Yes.

22 Q. Do you consider yourself an
23 expert on al-Qaeda?

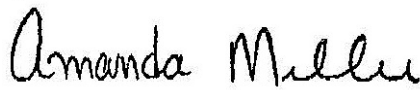
24 A. No.

CERTIFICATE

I, Amanda Maslynsky-Miller, Certified Realtime Reporter, do hereby certify that prior to the commencement of the examination, JOHN SIDEL, was remotely sworn by me to testify to the truth, the whole truth and nothing but the truth.

I DO FURTHER CERTIFY that the foregoing is a verbatim transcript of the testimony as taken stenographically by me at the time, place and on the date hereinbefore set forth, to the best of my ability.

I DO FURTHER CERTIFY that I am neither a relative nor employee nor attorney nor counsel of any of the parties to this action, and that I am neither a relative nor employee of such attorney or counsel, and that I am not financially interested in the action.



Amanda Miller
Certified Realtime Reporter
Dated: May 12, 2021

(The foregoing certification of this transcript does not apply to any reproduction of the same by any means, unless under the direct control and/or supervision of the certifying reporter.)

1 INSTRUCTIONS TO WITNESS

2
3 Please read your deposition
4 over carefully and make any necessary
5 corrections. You should state the reason
6 in the appropriate space on the errata
7 sheet for any corrections that are made.

8 After doing so, please sign
9 the errata sheet and date it.

10 You are signing same subject
11 to the changes you have noted on the
12 errata sheet, which will be attached to
13 your deposition.

14 It is imperative that you
15 return the original errata sheet to the
16 deposing attorney within sixty (60) days
17 of receipt of the deposition transcript
18 by you. If you fail to do so, the
19 deposition transcript may be deemed to be
20 accurate and may be used in court.

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24

- - - - -
E R R A T A
- - - - -

PAGE	LINE	CHANGE - REASON
_____	_____	_____
_____	_____	_____
_____	_____	_____
_____	_____	_____
_____	_____	_____
_____	_____	_____
_____	_____	_____
_____	_____	_____
_____	_____	_____
_____	_____	_____
_____	_____	_____
_____	_____	_____
_____	_____	_____
_____	_____	_____
_____	_____	_____
_____	_____	_____
_____	_____	_____
_____	_____	_____
_____	_____	_____
_____	_____	_____

ACKNOWLEDGMENT OF DEPONENT

I, _____, do
hereby certify that I have read the
foregoing pages, 1 - 189, and that the
same is a correct transcription of the
answers given by me to the questions
therein propounded, except for the
corrections or changes in form or
substance, if any, noted in the attached
Errata Sheet.

JOHN SIDEL

DATE

Subscribed and sworn
to before me this
_____ day of _____, 20____.

My commission expires: _____

Notary Public

1	LAWYER'S NOTES		
2	PAGE	LINE	
3	_____	_____	_____
4	_____	_____	_____
5	_____	_____	_____
6	_____	_____	_____
7	_____	_____	_____
8	_____	_____	_____
9	_____	_____	_____
10	_____	_____	_____
11	_____	_____	_____
12	_____	_____	_____
13	_____	_____	_____
14	_____	_____	_____
15	_____	_____	_____
16	_____	_____	_____
17	_____	_____	_____
18	_____	_____	_____
19	_____	_____	_____
20	_____	_____	_____
21	_____	_____	_____
22	_____	_____	_____
23	_____	_____	_____
24	_____	_____	_____